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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 THE STATE OF NEVADA,
13 DEPARTMENT OF EMPLOYMENT
14 TRAINING and REHABILITATION, *ex*
rel. CHAGOLLA,

15 Plaintiff,

16 vs.

17 LYFT, INC.,

18 Defendants.
19

Case No.: 3:23-cv-00442-LRH-CLB

**ORDER GRANTING STIPULATION TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO DEFENDANT’S
MOTION TO DISMISS RELATOR’S
FIRST AMENDED COMPLAINT FOR
VIOLATIONS OF THE NEVADA
FALSE CLAIMS ACT**

(FIRST REQUEST)

20 Plaintiff THE STATE OF NEVADA, DEPARTMENT OF EMPLOYMENT TRAINING
21 and REHABILITATION, *ex rel.* CHAGOLLA (“Plaintiff”) and Defendants LYFT, INC.
22 (“Defendants”) (collectively the “Parties”), by and through their undersigned counsel, hereby
23 agree and stipulate to extend time for Plaintiff to file their response to Defendant’s Motion to
24 Dismiss Relator’s First Amended Complaint for Violations of the Nevada False Claims Act
25 from its current deadline of Thursday, December 28, 2023, up to and including **Monday,**
26 **January 29, 2024.**

27 This is the first request for an extension of time to respond to Defendant’s Motion to
28 Dismiss Relator’s First Amended Complaint.

1 This instant request for an extension is needed because Plaintiff's Lead Counsel has a
2 pre-scheduled vacation for the upcoming Christmas Holiday. This extension is requested and
3 sought prior to the expiration of the deadline in question.

4 This stipulation is made in good faith and not for the purposes of undue delay or burden.
5 No parties are prejudiced by this stipulation.

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7 DATED: December 15, 2023

8 Respectfully submitted,

9 /s/ Joshua D. Buck

10 Mark R. Thierman, Nev. Bar No. 8285
11 Joshua D. Buck, Nev. Bar No. 12187
12 Leah L. Jones, Nev. Bar No. 13161
13 **THIERMAN BUCK LLP**
14 *Attorneys for Plaintiff*

Respectfully submitted,

9 /s/ Kirsten A. Milton

Kirsten A. Milton, Esq. Nev. Bar No. 14401
Joshua A. Sliker, Esq. Nev. Bar No. 12493
JACKSON LEWIS P.C.
Attorneys for Defendant, Lyft, Inc.

15 **ORDER**

16 IT IS SO ORDERED.

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18 DATED this 18th day of December, 2023.

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22 LARRY R. HICKS
23 UNITED STATES DISTRICT JUDGE
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